

# EXHIBIT B

# REGULATORY RESOLUTIONS

Receivers | Examiners | Monitors

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September 27, 2024

*Via Email (dvacco@lippes.com)*

Strategic LD, LLC  
c/o Dennis C. Vacco  
Lippes Mathias LLP  
50 Fountain Plaza, Suite 1700  
Buffalo, NY 14202

Re: *Consumer Financial Protection Bureau, et al. v. StratFS, LLC, et al.*  
U.S. District Court (W.D.N.Y.), Case No. 1:24-cv-00040-EAW-MJR  
Determination that Strategic LD, LLC is a Receivership Defendant

Dear Mr. Vacco:

As you are aware, on January 11, 2024, the U.S. District Court for the Western District of New York issued a Temporary Restraining Order with an Asset Freeze, Appointment of a Receiver, and Other Equitable Relief (“TRO”) in the above-referenced case, appointing me as the temporary receiver of the Receivership Defendants. On March 4, 2024, the Court entered a Preliminary Injunction, which continues the terms of the TRO and asset freeze and confirms my appointment as Receiver.

## Receivership Defendants

The Preliminary Injunction defines “Receivership Defendants” as the Corporate Defendants<sup>1</sup> and their subsidiaries, affiliates, divisions, successors, and assigns, *as well as any other business related to the Defendants’ debt-relief services and which the Receiver has reason to believe is*

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<sup>1</sup> The Preliminary Injunction defines “Corporate Defendants” to mean Stratfs, LLC (f/k/a Strategic Financial Solutions, LLC), Strategic Client Support, LLC, Strategic CS, LLC, Strategic FS Buffalo, LLC, Strategic NYC, LLC, BCF Capital LLC, T Fin, LLC, Strategic Consulting, LLC, Versara Lending, LLC, Strategic Family, Inc., Anchor Client Services, LLC, Bedrock Client Services, LLC, Boulder Client Services, LLC, Canyon Client Services, LLC, Carolina Client Services, LLC, Great Lakes Client Services, LLC, Guidestone Client Services, LLC, Harbor Client Services, LLC, Heartland Client Services, LLC, Monarch Client Services, LLC, Newport Client Services, LLC, Northstar Client Services, LLC, Option 1 Client Services, LL, Pioneer Client Servicing, LLC, Rockwell Client Services, LLC, Royal Client Services, LLC, Stonepoint Client Services, LLC, Summit Client Services, LLC, Whitestone Client Services, LLC, and their successors, assigns, affiliates, or subsidiaries, and each of them by all names each might be known, including any fictitious business entities or business names created or used by these entities.

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*owned or controlled in whole or in part by any of the Defendants*, and includes fictitious names under which they do business. *See Preliminary Injunction, Definitions, ¶ N* (emphasis added).

In the event the Receiver identifies an additional Receivership Entity, the Preliminary Injunction authorizes the Receiver to do the following:

If the Receiver identifies a nonparty entity as a Receivership Entity, promptly notify the entity as well as the parties, and inform the entity that it can challenge the Receiver's determination by filing a motion with the Court. Provided, however, that the Receiver may delay providing such notice until the Receiver has established control of the nonparty entity and its Assets and records, if the Receiver determines that notice to the entity may result in the destruction of records, dissipation of Assets, or any other obstruction of the Receiver's control of the entity[.]

Preliminary Injunction, Section IX.S., Duties of Receiver.

### **Determinations Regarding Receivership Defendants**

I believe that Strategic LD, LLC ("Strategic LD") qualifies as a Receivership Defendant. That determination is based on a review of documents indicating Strategic LD is owned or controlled, in whole or in part, by Defendant Strategic Family, Inc., via its subsidiary Fusion Client Services, LLC. I have also reviewed correspondence sent by the Internal Revenue Service to Strategic LD in 2024 that identifies Defendant Ryan Sasson as the "sole member" of the entity. Additionally, at all material times, Strategic LD served as the payroll processing company for Defendant Versara Lending, LLC ("Versara"), and processed payroll for Versara employees using funds deposited by Versara.

I am happy to discuss this determination and will consider additional information you believe may change my conclusion. Further, if you wish to challenge the determination, you may do so by filing a motion with the Court. *See Preliminary Injunction, IX.S.*

Very truly yours,



Thomas W. McNamara

TWM:jej

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